UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

CCR INTERNATIONAL, INC., CCR Development Group, Inc., and José Fuertes, and Banco Cooperativo de Puerto Rico, Plaintiffs,

V.

No.:15-6563(PAE-NFK)

Civil Action

No.: 16-6280(PAE-NFK)

Civil Action

No.:17-6697 (PAE-NFK)

Civil Action

ELIAS GROUP, LLC,

Defendant.

MOTION TO COMPEL PRODUCTION

TO THE HONORABLE COURT:

COME NOW Plaintiffs, CCR International, Inc., CCR Development Group, Inc., and José Fuertes, through their undersigned counsel, and respectfully ALLEGE and PRAY as follows:

1. For the reasons set forth in the Memorandum of Law filed today, the appearing parties ask this Court to order Elias Group to produce the documents detailed therein because Elias Group cannot properly assert the client/accountant or work product privilege with respect to those documents.

WHEREFORE, in view of the foregoing, for the reasons in the Memorandum of Law filed today, the CCR Parties respectfully request this Court to order Elias

Group to produce the documents identified in Exhibit 2 to the Memorandum of Law, which Defendant has withheld based on privileges to which Defendant has no entitlement.

This 20th day of November 2019.

I HEREBY CERTIFY that I have filed this Motion with the Court's ecf system, which system will notify all counsel of record.

Respectfully Submitted,

/S/ JANE BECKER
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11/20/19

The Court administratively denies, without prejudice, the motions pending at docket 210 and 211, for failure to comply with the Court's Individual Rule 2(C). The Court grants leave for the CCR Parties to re-file their motion to compel in compliance with the Court's Individual Rules.

SO ORDERED.

PAUL A. ENGELMAYER United States District Judge

Paul A. Ergely